

reasonableness and necessity of the attorney's fees attorneys charge their clients in employment matters in the Eastern District of Texas and Jefferson County.

On September 9, 2020, Plaintiff employed The Richey Law Firm and The Craighead Law Firm represent her in her claims against Defendants, Texas Department of Criminal Justice and Bryan Collier. Clayton Craighead and I kept a detailed and systematic account of the time we each spent on this matter and the type of work performed. The time we spent on the case has consisted of the usual and customary work, namely telephone and email conversations with client, telephone conversations and emails with counsel, drafting and filing Plaintiff's Original Complaint, drafting discovery requests, responding to discovery requests, preparing for and defending Plaintiff at deposition, preparing for and attending two separate mediations, responding to motions to dismiss and exclude, preparing for and attending trial. From approximately September 2, 2020 to present, we have spent 502 hours on this matter, which were reasonable and necessary for a case of this complexity.

The contemporaneous time records attached as Exhibit 1 to the Motion for and Award of Reasonable Fees and Costs were checked against other contemporaneous records, filings and electronic communications to ensure against recording errors, and were edited for clarity and completeness.

Additionally, The Craighead Law Firm employees a certified paralegal Sara Rehem. Ms. Rehem spent 13.4 hours assisting us in trial. Ms. Rehem's hourly rate is \$80.00.

Based on my experience and expertise, I am of the opinion that \$550.00/hour represents a reasonable and proper fee for our services in the litigation of this case and is customary and reasonable for attorneys with the years of experience, education and proven results obtained by

Mr. Craighead and myself. I am also of the opinion that 502 hours represents a reasonable and necessary amount of time to represent and pursue this matter, given the complexity.

Additionally, it should be noted that Ms. Richey and I split our work by two methods: 1) procedural levels, and 2) subject matter. For example, Ms. Richey took primary responsibility for the initial drafting of the complaint and discovery matters. Mr. Craighead took primary responsibility for drafting an opposition to motions filed by Defendants. By separating our work using these methods, Mr. Craighead and I were able to avoid performing duplicative work.

Therefore, my opinion is that \$277,172.00 is a reasonable and necessary fee for our services from approximately September 2020 to present. (this consists of 502 attorney hours at \$550/hour and 13.4 paralegal hours at \$80/hour)

Additionally, Mr. Craighead and I incurred approximately \$4,701.37 in expenses associated with the litigation of this case. An itemized list of those costs and expenses is attached as Exhibit 5 to the Motion for and Award of Reasonable Fees and Costs.

True and correct contemporaneous records of the time Clayton Craighead, Sara Rehen and I spent and the tasks we performed are attached as Exhibit 1 to the Motion for and Award of Reasonable Fees and Costs.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Harris County, State of Texas, on the 21st day of April, 2022.



Sara Richey